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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

JUL 18 1996

Federal Communications Commission  
Office of Secretary

In the Matter of )  
 )  
Amendment of Part 90 of the ) PR Docket No. 93-61  
Commission's Rules to Adopt )  
Regulations for Automatic )  
Vehicle Monitoring Systems )  
  
To: The Commission

**COMMENTS IN SUPPORT OF THE PETITION FOR  
PARTIAL RECONSIDERATION FILED BY THE  
INTELLIGENT TRANSPORTATION SOCIETY OF AMERICA**

The Land Mobile Communications Council ("LMCC"), pursuant to Section 1.429 of the Commission's Rules, 47 C.F.R. §1.429, hereby submits these Comments in support of the Petition for Partial Reconsideration filed by the Intelligent Transportation Society of America ("ITS America") in the above-referenced docket. In the Report and Order in this proceeding, the Commission implemented a new Subpart M in Part 90 of its Rules and named it "Transportation Infrastructure Radio Services" ("TIRS").<sup>1</sup> LMCC urges the Commission to reconsider naming this Subpart "Intelligent Transportation Systems Radio Service" so that the Commission's nomenclature is consistent with that of other government agencies and the private sector. LMCC supports the

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<sup>1</sup> In the Matter of Amendment of Part 90 of the Commission's Rules to Adopt Regulations for Automatic Vehicle Monitoring Systems, 10 FCC Rcd. 4695 (1995).

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use of a single term for these radio services by users, manufacturers and regulators to avoid confusion and to promote emerging technologies.

LMCC is a non-profit association of organizations representing users of land mobile radio and providers of land mobile services and equipment. LMCC acts on behalf of the vast majority of public safety, business, industrial, private, common carrier, and land transportation radio users, as well as a diversity of land mobile service providers and equipment manufacturers, many of whom are involved in radio technology used in the context of intelligent transportation systems. LMCC has monitored developments in this docket since its release and has polled its membership regarding the simple, but important, issue raised by ITS America in its petition. The response from LMCC's membership has been overwhelmingly in favor of adopting the term "Intelligent Transportation Systems." LMCC agrees with ITS America that this term best describes the technologies being developed and the services being implemented. LMCC therefore believes that it would well serve the Commission to adopt this term for regulatory purposes as well.

LMCC is aware of and acknowledges the role of ITS America in fostering the development of intelligent transportation systems and in educating the public about the benefits that intelligent transportation systems will bring to our economy and our society.

LMCC also notes that the Commission itself, in attempting to explain the new Subpart M of Part 90, consistently uses the term "Intelligent Transportation Systems" and that the Department of Transportation regularly uses this widely-accepted term. LMCC's members consistently refer to these technologies and services as "intelligent transportation systems."

For the above-stated reasons, LMCC supports the ITS America petition and respectfully urges the Commission to rename the new Subpart M of Part 90 the "Intelligent Transportation Systems Radio Service."

Respectfully submitted,

LAND MOBILE COMMUNICATIONS COUNCIL

By: Chester G. Jones /jgd  
Chester G. Jones  
President

Dated: July 17, 1996